

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JOHN F. RICHARDS,)	
Plaintiff)	
)	
VS.)	
)	
MASSACHUSETTS DEPARTMENT OF)	
CORRECTION; UMASS CORRECTIONAL)	
MEDICAL SERVICES; KATHLEEN)	
DENNEHY, COMMISSIONER; CAROL)	
MICI, ACTING SUPERINTENDENT;)	CIVIL ACTION NO. 04-CV-10291-RWZ
MASSACHUSETTS BOARD OF)	
REGISTRATION (IN MEDICINE);)	
M.L. ANGELES, MEDICAL DOCTOR;)	
KHALID MOHAMED, MEDICAL)	
DOCTOR; DR. CHILDS, MEDICAL)	
DOCTOR; ASMA AHMED, NURSE)	
PRACTITIONER; and JANE DOE NO. 1,)	
PHYSICAL THERAPIST,)	
Defendants)	

**MOTION OF DEFENDANT, UMASS CORRECTIONAL
HEALTH PROGRAM, FOR SUMMARY JUDGMENT**

For the reasons set forth in the accompanying Memoranda, the defendant, **UMass Correctional Health Program**, by counsel, moves that judgment as a matter of law be rendered in its favor and against the plaintiff on all claims in this action pending before this Honorable Court, pursuant to Federal Rule of Civil Procedure 56, and Local Rule 56.1.

Respectfully submitted,

The Defendant,
**UMASS CORRECTIONAL
HEALTH PROGRAM**

By its attorneys,

MORRISON, MAHONEY & MILLER, LLP

/s/ Charles M. Urso

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